

**IRWIN, CAMPBELL & TANNENWALD, P.C.**

ATTORNEYS AT LAW  
1730 RHODE ISLAND AVENUE, N.W.  
SUITE 200  
WASHINGTON, D.C. 20036  
(202) 728-0400  
FACSIMILE (202) 728-0354

RICK D. RHODES  
(202) 728-0401 Ext. 113

October 16, 1996

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Federal Communications Commission  
Office of Secretary

**Via Hand Delivery**

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

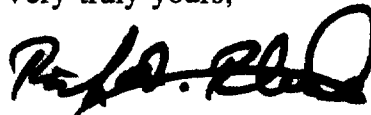
Re: Greers Ferry Broadcasting;  
Petition for Rule Making;  
Section 73.202(b);  
FM Table of Allotments

Dear Mr. Caton:

Transmitted herewith, on behalf of Greers Ferry Broadcasting, are an original and four copies of a Petition for Rule Making ("Petition") wherein the Petitioner seeks the allotment of Channel 256A to Pangburn, Arkansas as the community's first local broadcast service.

It is believed that the enclosed Petition and the attached "Engineering Statement" are complete and in order for early consideration. Should any questions arise concerning this matter however, please communicate directly with the undersigned.

Very truly yours,



Rick D. Rhodes  
Counsel for Greers Ferry Broadcasting

Enclosures

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Before the

**FEDERAL COMMUNICATIONS COMMISSION**

Washington, DC 20554

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OCT 16 1996

Federal Communications Commission  
Office of Secretary

In the Matter of )  
 )  
Amendment of Section 73.202(b), )  
Table of Allotments )  
FM Broadcast Stations )  
(Pangburn, Arkansas) )

MM Docket No. \_\_\_\_\_

RM - \_\_\_\_\_

To: The Chief, Policy and Rules Division  
Mass Media Bureau

**PETITION FOR RULE MAKING**

Greers Ferry Broadcasting ("Greers Ferry") by its attorneys, hereby respectfully requests that Section 73.202(b) of the Commission's Rules,<sup>1</sup> the Table of Allotments for FM Broadcast Stations, be amended to allot Channel 256A to Pangburn, Arkansas as the community's first local service. In support whereof, the following information is respectfully submitted:

1. Greers Ferry proposes the amendment of the Table of FM Allotments as is set forth herein to permit the allocation of Channel 256A to Pangburn, Arkansas. In accordance with the attached Engineering Statement, which was prepared for Greers Ferry by its engineering contractor, Dettra Communications, Inc., the proposed allotment of Channel 256A to Pangburn satisfies all the Commission's spacing requirements for a new FM allotment.

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<sup>1</sup> 47 CFR Section 73.202(b) (1995).

2. Pangburn currently has no local radio service. The town had a 1990 Census population of 630. The town has a full time school district population of 700 students which indicates that the town is an “educational hub” for the predominantly rural immediately adjacent surrounding area. Pangburn has its own post office and is a “banking town” according to information compiled by the Rand McNally organization.<sup>2</sup> Pangburn features an active commercial and business district. The town has an elected Mayor and City Council. Pangburn also has a public library. Additionally, the town operates independent water and sewer system facilities. Accordingly, Pangburn is a thriving town which provides numerous services to its own residents as well as to the residents of the surrounding region. Thus, Pangburn, Arkansas clearly is a community in need of a local radio broadcasting service.

3. Based upon the foregoing information, Greers Ferry submits that the Commission should act expeditiously to allocate Channel 256A to Pangburn, Arkansas, since the proposed allotment will serve the public interest by providing the residents of Pangburn with a first local broadcast service. Upon Commission allotment of Channel 256A to Pangburn and the subsequent opening of an application filing window, Greers Ferry hereby affirms that it will submit an application for construction permit for the new station. When and if said application is granted, Greers Ferry will proceed to construct the radio station facility without delay, and will promptly commence service to the residents of Pangburn and the surrounding area in the public interest.

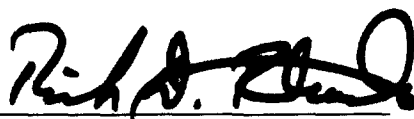
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<sup>2</sup> Commercial Atlas and Marketing Guide 1993, at page 263.

**WHEREFORE, THE PREMISES CONSIDERED,** Greers Ferry Broadcasting respectfully requests that the FM Table of Allotments promptly be amended to allot Channel 256A to Pangburn as its first local service.

Respectfully submitted,

**GREERS FERRY BROADCASTING**

By:   
Rick D. Rhodes

Irwin, Campbell & Tannenwald, P.C.  
1730 Rhode Island Avenue  
Suite 200  
Washington, DC 20036-3101  
(202) 728-0400

Its Attorneys

October 16, 1996

## ENGINEERING STATEMENT

In Support of Petition for Rule Making to Add  
Channel 256A for Pangburn, Arkansas, to  
Section 73.202(b), Table of Allotments, of the  
Federal Communications Commission's Rules and Regulations.

This engineering statement has been prepared at the request of Greers Ferry Broadcasting for the allotment of FM Channel 256A, 99.1 MHz, for Pangburn, Arkansas. From an arbitrary reference point 14.8 km Northnorthwest of Pangburn, an FM Channel Spacing Study was run and found that Channel 256A could be located in that area. Attached as Exhibit 1E is a copy of that Spacing Study. The Study shows that even though there are adjacent channel considerations which are close, there is a reasonable area in which a transmitting tower could be located and meet the required separation to Kennett, Missouri, of 165 km, the required separation to Little Rock, Arkansas, of 95 km, and provide more than the required 3.16 mv/m Contour over the principal community of Pangburn. Exhibit 1A attached is a portion of a Sectional Aeronautical Chart showing the reference point, the 165 km arc from Kennett, Missouri, the 95 km arc from Little Rock, Arkansas, and the predicted 3.16 mv/m and 1.0 mv/m Contours which clearly encompasses the community of Pangburn. Based on the 1990 U.S. Census of Population, Pangburn has 630 persons within its boundaries.

Attached as Exhibit 1B is a portion of the Greers Ferry Dam Quadrangle Sheet showing the reference location and the character of the area in which a tower could be located. The actual location of the reference point is not necessarily high in elevation but there are a number of hills around at about 900 feet which would be good antenna locations to serve Pangburn. Also shown on Exhibit 1B are the limiting arc's from Kennett and Little Rock.

Attached as Exhibit 1C is a portion of the Pangburn Quadrangle Sheet showing the City Limits of Pangburn which is 1.5 miles by 1.65 miles square (approximately). Identifiable buildings, schools, churches, and other land marks are shown on the Quadrangle Sheet.

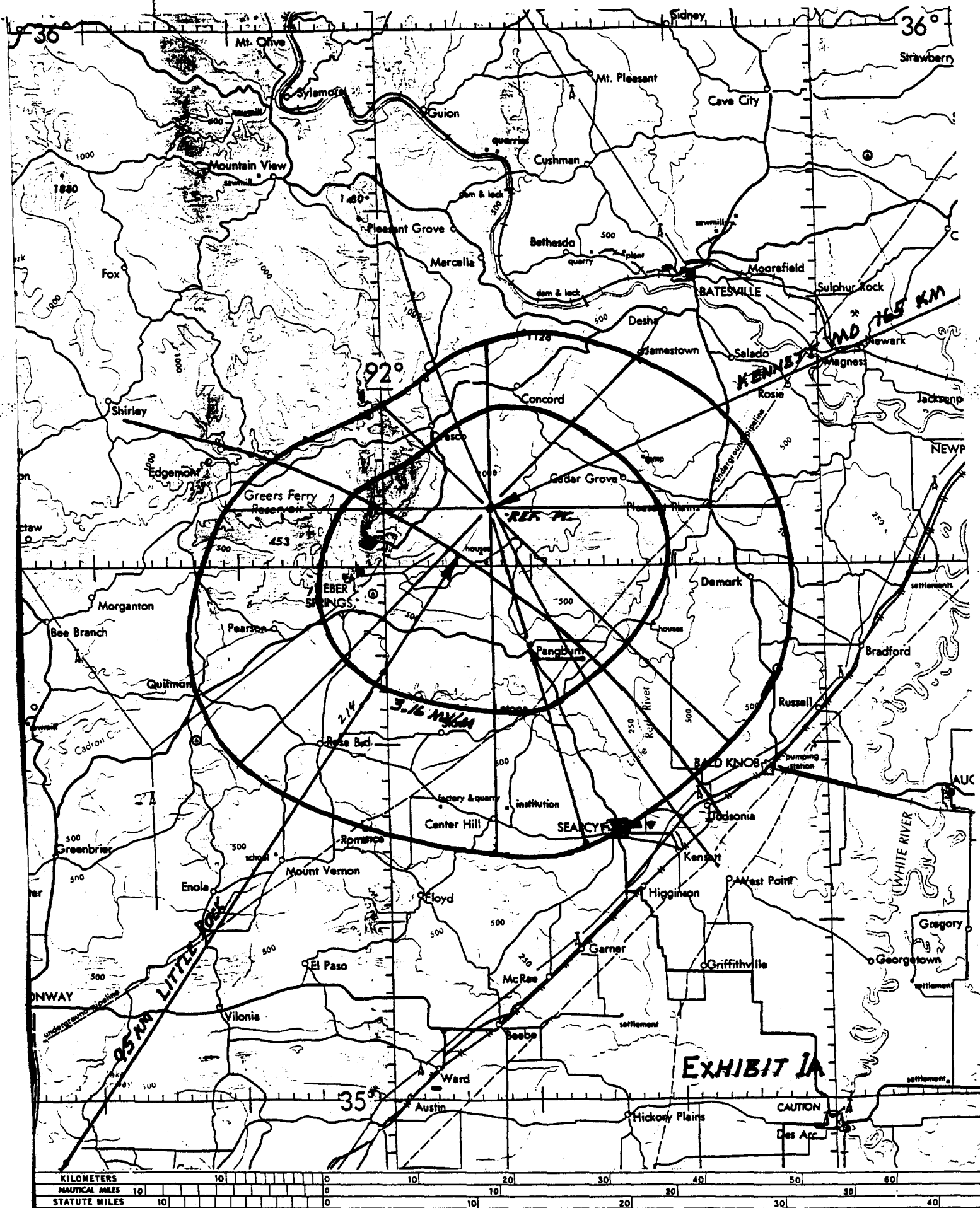
Exhibit 1D is a tabulations of the various Contours based on a Class A (6,000 Watts at a HAAT of 100 meters) operation at the reference site.

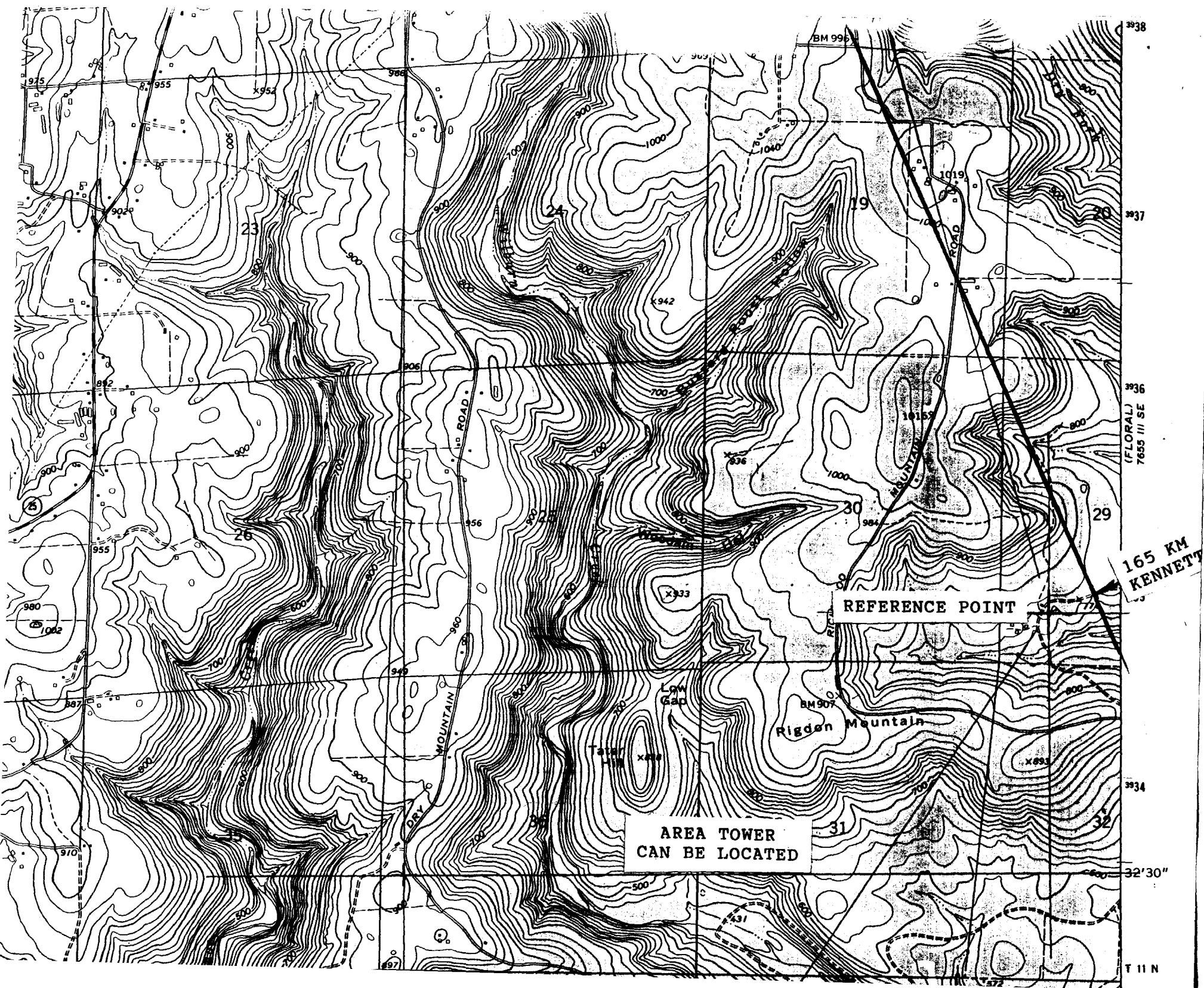
Pangburn, Arkansas, is an independent community with all of ingredients and functions of an independent community and does not have any local broadcast service. In the event that the Federal Communications Commission grants the attached Petition and allots Channel 256A to Pangburn, Greers Ferry Broadcasting is prepared to file an application with the FCC for those facilities and operate that station should the FCC approves.

Respectfully submitted,

  
John E. Dettra, Jr.

DETTRA COMMUNICATIONS, INC.





BM 996

3938

3937

3936

(FLORAL)

7655 III SE

29

165 KM  
KENNETT

REFERENCE POINT

Rigdon Mountain

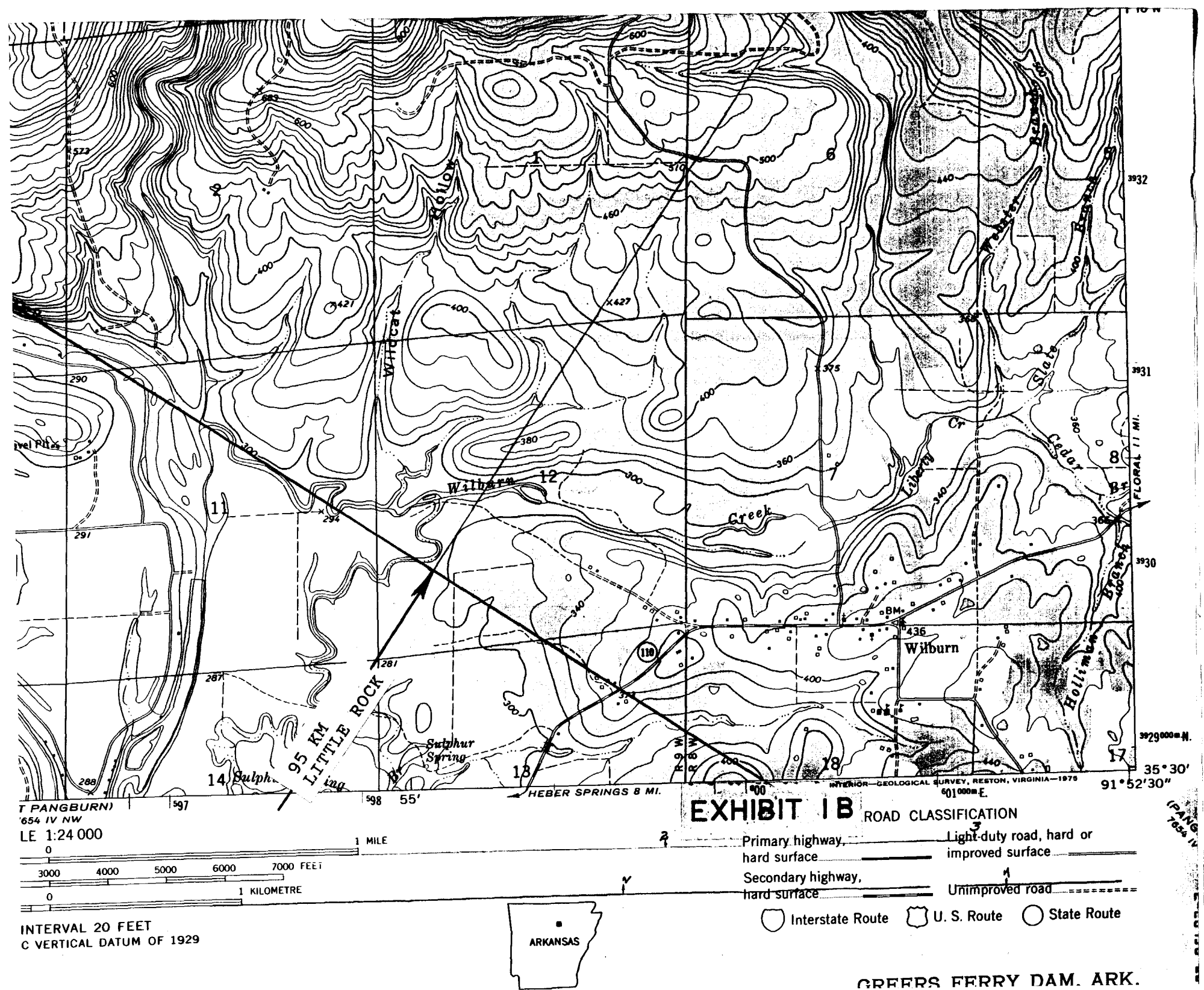
3934

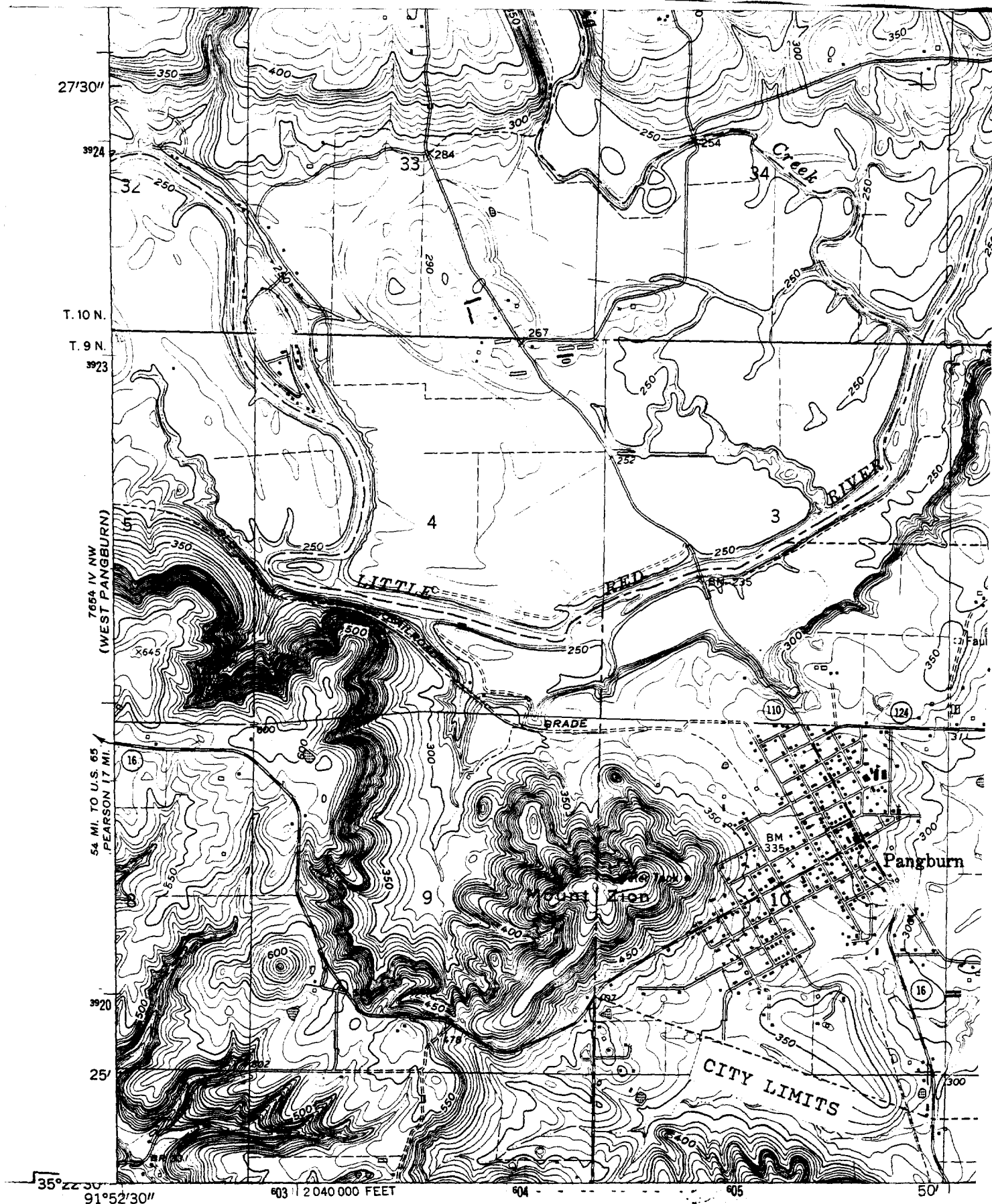
AREA TOWER  
CAN BE LOCATED

32'30"

T 11 N







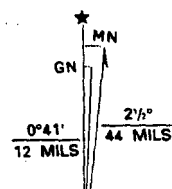
(SIDON)  
7654 IV SW

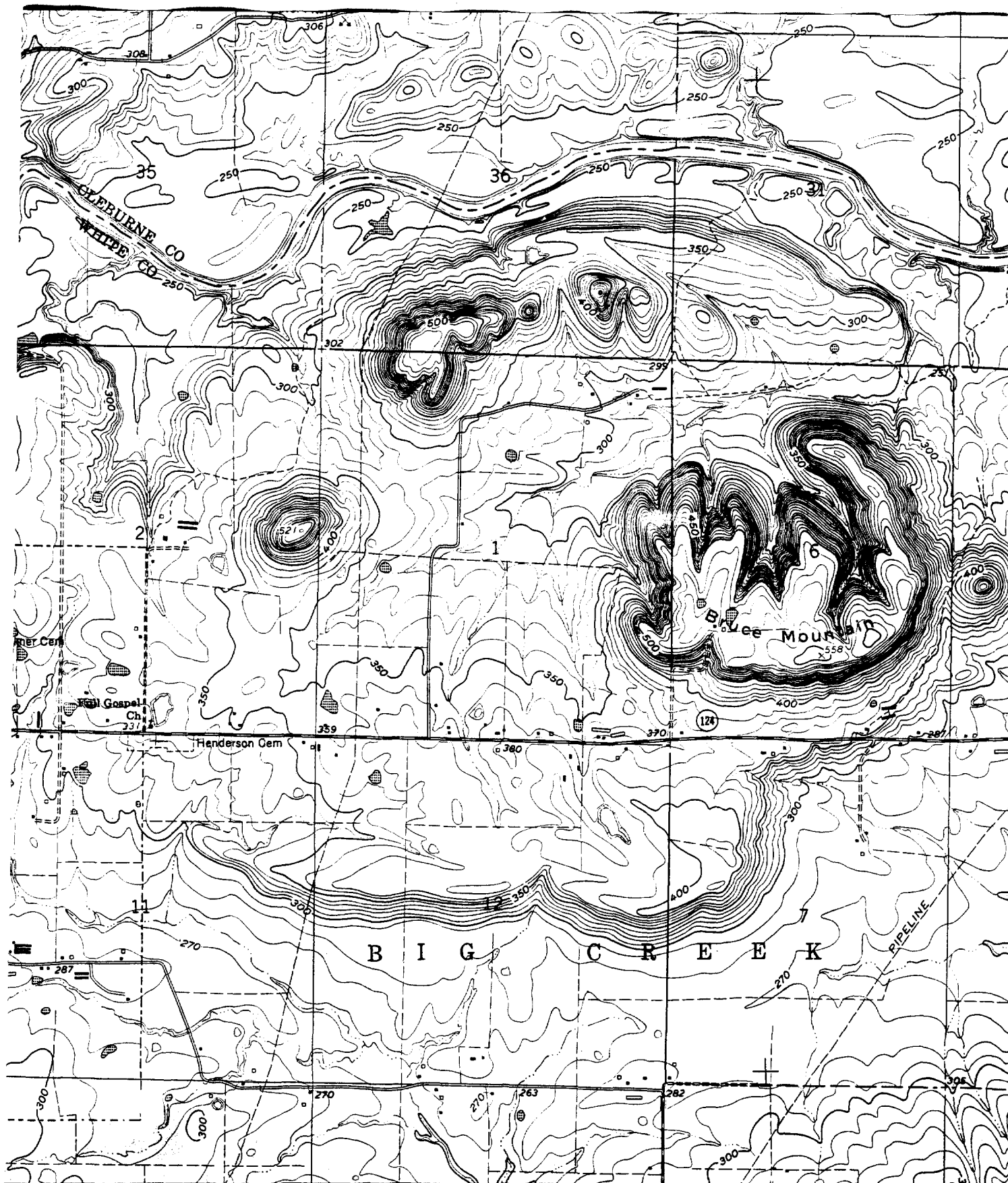
Produced by the United States Geological Survey  
Control by USGS and NOS/NOAA

**EXHIBIT IC**

Topography by photogrammetric methods from aerial  
photographs taken 1960. Field checked 1962

Polyconic projection. 1927 North American datum  
10,000-foot grid based on Arkansas coordinate system, north zone



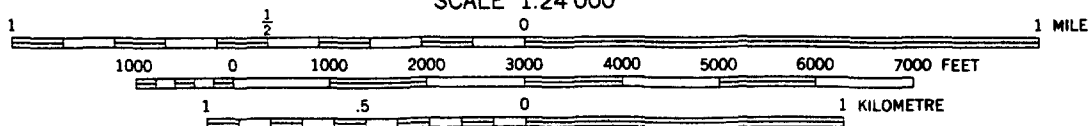


(LETONA)  
7654 IV SE

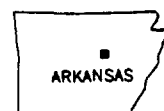
SCALE 1:24 000

ALBION 2.5 MI. R. 8 W.  
SEARCY 10 MI. R. 7 W.

47°30' 10"



CONTOUR INTERVAL 10 FEET  
NATIONAL GEODETIC VERTICAL DATUM OF 1929



# EXHIBIT 1D

## FM Coverage Predictions

Program Run for NEW-FM

(English Units)

BEARING (degrees)	HAAT (feet)	ERP (kw)	3.16mV/m (70dBu) (miles)	1.0mV/m (60dBu) (miles)	.5mV/m (54dBu) (miles)	.05mV/m (34dBu) (miles)
0	121.0	6.0	6.3	10.8	15.2	40.2
45	193.0	6.0	7.7	13.7	18.7	44.8
90	371.0	6.0	10.8	18.7	25.2	52.8
135	491.0	6.0	12.3	21.3	28.2	56.3
180	545.0	6.0	13.3	22.3	29.7	57.3
225	608.0	6.0	13.7	23.2	30.7	58.8
270	323.0	6.0	9.8	17.2	23.7	51.3
315	-28.0(1)	6.0	5.7	9.8	14.2	38.2
Average HAAT	328.0					
165(2)	577.0	6.0	13.3	22.7	30.2	58.2

(1) Negative HAAT, 100 feet used.

(2) Radial at 165° over principal communicaty of Pangburn, Arkansas.

GREER'S FERRY BROADCASTING  
WHEATON, MD

EXHIBIT 1E  
Page 1  
August 19, 1996

FM Spacing study

Title: PANGBURN, AR #2  
Channel 256A ( 99.1 MHz)  
Database: DW 08/09/96

Latitude: 35-33-15  
Longitude: 91-52-45  
Safety zone: 30 km

Call	Auth	Licensee	name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC	File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KABF	LIC	ARKANSAS	BCG FOUNDATION	*202C1	90.9	34-47-31	212.8	100.6	22
LITTLE ROCK			AR BLED-900803KC	88.3	237	92-28-38	32.5	78.59	CLEAR
WQOX	LIC	BD OF ED	MEMPHIS CITY SC	*203C2	30	35-09-17	102.8	192.1	15
MEMPHIS			TN BLED-901205KA	88.5	131	89-49-20	284.0	177.1	CLEAR
Ant: composite FMLC-6									
KURB	LIC	GHB OF	LITTLE ROCK, INC.	253C	100	34-47-56	213.9	100.9	95
LITTLE ROCK			AR BLH-880727KA	98.5	392	92-29-44	33.5	5.864	CLOSE
Was KURB-FM 11/01/95 per FCC release #266 dated 11/03/95									3.64 mi.
KWTO-FM	LIC	KWTO, INC.		254C1	100	37-04-06	323.2	211.4	75
SPRINGFIELD			MO BLH-830217AF	98.7	168	93-18-31	142.3	136.4	CLEAR
Was KKHT 02/14/94 per FCC release #224 dated 02/25/94									
KTMO	LIC	KBOA, INC.		255C	100	36-07-53	66.6	165.3	165
KENNETT			MO BLH-890504KB	98.9	303	90-11-34	247.6	.270	CLOSE
WYMX	LIC	MISSISSIPPI	NETWORK INCO	256C	100	33-34-35	147.5	259.2	226
GREENWOOD			MS BLH-890724KB	99.1	300BT	90-22-34	328.4	33.15	CLEAR
Was WSWG-FM 08/15/88									
NEW	APP	STEPHEN A.	WOMACK	257A	6	35-20-13	255.4	93.91	72
ATKINS			AR BPH-950724MF	99.3	100	92-52-44	74.8	21.91	CLEAR
Received per FCC release #23569 dated 08/11/95									
NEW	APP	KVOM, INC.		257A	6	35-13-10	247.4	95.82	72
ATKINS			AR BPH-950724MB	99.3	100	92-51-05	66.8	23.82	CLEAR
Received per FCC release #23566 dated 08/07/95									
ALLOC				257A		35-14-49	249.7	97.22	72
ATKINS			AR DOC-94-135	99.3		92-52-53	69.1	25.22	CLEAR
Granted effective 06/23/95, adopted 05/03/95, released 05/09/95; Filing window 06/23-07/24/95 **CLOSED** ; RM-8541; SITE RESTRICTION 3.1 MI E									
KYFX	LIC	NAMELOC	BROADCASTING	258A	3	34-45-58	203.4	95.24	31
LITTLE ROCK			AR BLH-920831KC	99.5	95	92-17-38	23.2	64.24	CLEAR
Was KLVV 02/01/92 per FCC release #174 dated 01/17/92; Ant: Elec. Res. Inc. FM L 3E									
KMAC	LIC	COUNTRY	MUSIC COMM., INC	259C2	50	36-35-34	335.4	127.0	55
GAINESVILLE			MO BLH-940304KA	99.7	150	92-28-21	155.0	72.03	CLEAR
Ant: Harris FMH-4AC									

>> End of channel 256A study <<

GREER'S FERRY BROADCASTING  
WHEATON, MD

EXHIBIT 1E  
Page 2  
August 19, 1996

FM Spacing study

Title: PANGBURN, AR #2  
Channel 256A ( 99.1 MHz)  
Database: FCC 08/08/96

Latitude: 35-33-15  
Longitude: 91-52-45  
Safety zone: 30 km

Call City of License	Auth Licensee name	St FCC File no.	Chan Freq	ERP-kW EAH-m	Latitude Longitude	Br-to -from	Dist. (km)	Req. (km)
KABF Little Rock	LIC Arkansas Broadcasting Fo	AR	*202C1 88.3	91 237	34-47-31 92-28-38	212.8 32.5	100.6 78.59	22 CLEAR
WQOX Memphis	LIC Memphis City Schools	TN	*203C2 88.5	30 131	35-09-17 89-49-20	102.8 284.0	192.1 177.1	15 CLEAR
ALLOC Little Rock		AR	253C 98.5		34-47-56 92-29-44	213.9 33.5	100.9 5.864	95 CLOSE
KURB Little Rock	LIC GHB of Little Rock, Inc.	AR BLH-880727KA	253C 98.5	100 392BT	34-47-56 92-29-44	213.9 33.5	100.9 5.864	95 CLOSE
ALLOC Springfield		MO	254C1 98.7		37-04-06 93-18-31	323.2 142.3	211.4 136.4	75 CLEAR
KTMO Kennett	LIC Kboa, Inc.	MO BLH-890504KB	255C 98.9	100 303	36-07-53 90-11-34	66.6 247.6	165.3 .270	165 CLOSE
ALLOC Kennett		MO	255C 98.9		36-07-53 90-11-34	66.6 247.6	165.3 .270	165 CLOSE
ALLOC Fort Smith		AR	256C 99.1		35-09-56 93-40-35	255.7 74.6	168.9 -57.1	226 SHORT
NEW Atkins	APC Stephen A. Womack	AR 950724MF	257A 99.3	6 100	35-20-13 92-52-44	255.4 74.8	93.91 21.91	72 CLEAR
NEW Atkins	APC KVOM, Inc.	AR 950724MB	257A 99.3	6 100	35-13-10 92-51-05	247.4 66.8	95.82 23.82	72 CLEAR
ALLOC Atkins		AR DOC-94-135	257A 99.3		35-14-49 92-52-53	249.7 69.1	97.22 25.22	72 CLEAR
Filing window 06/23-07/24/95 **CLOSED**								
PRM Batesville	ADD Arkansas Radio Broadcast	AR	258A 99.5		35-50-28 91-34-45	40.2 220.4	41.84 10.84	31 CLOSE
ALLOC Gainesville		MO DOC-86-242	259C2 99.7		36-36-06 92-25-48	337.1 156.8	126.4 71.38	55 CLEAR
Filing window 05/01-06/01/87 **CLOSED**								

>> End of channel 256A study <<